

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA )  
 )  
 v. ) CRIMINAL NO. 05-10204-GAO  
 )  
 PAUL HICKS )

**GOVERNMENT'S REQUESTED VOIR DIRE QUESTIONS**

The United States of America respectfully requests that the Court ask prospective trial jurors in this case the following questions:

1. This case was investigated by the Federal Bureau of Alcohol, Tobacco, Firearms and Explosives, the Massachusetts State Police, and the Brockton Police Department. Is there anything about your attitude toward those law enforcement agencies that would prevent you from fairly and impartially evaluating the evidence and rendering a fair and impartial verdict?
2. The United States of America is the prosecuting authority in this trial. You will hear the United States referred to throughout the trial as "the government." Have you, or any member of your immediate family, or anyone with whom you are close:
  - (a) ever been employed by the federal government in any capacity;
  - (b) ever filed a lawsuit or claim of any kind against any police or other law enforcement officer; or
  - (c) ever filed a claim or lawsuit against the United States or any of its agencies, or answered a claim or lawsuit filed by the federal government?
3. Have any of you or any members of your immediate family been involved in the criminal justice system as a defendant in a criminal case?
4. In this case, the government alleges, in part, that the defendant possessed a firearm and ammunition after having been convicted of a crime with a punishment in excess of one year. Under the laws of the United States, it is illegal for a person convicted of such a crime to possess a firearm or ammunition affecting commerce. Do any of you oppose firearms laws or otherwise hold strong views regarding the regulation or restriction of the possession of firearms or ammunition, such that you may be unable to apply the law as I instruct you, or to be completely fair and impartial juror in this case?
5. Do you have any beliefs or feelings which would prevent you from completely and honestly applying the law, as I give it to you at the end of the case, to the facts as you find them?

6. Do you know of any reason why you cannot sit as a fair and impartial juror in the trial of this case?

Respectfully submitted,

MICHAEL J. SULLIVAN  
United States Attorney

By: /s/ Jonathan F. Mitchell  
JONATHAN F. MITCHELL  
Assistant U.S. Attorney